

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS - EL PASO DIVISION

Las Americas Immigration Advocacy Center, <i>Plaintiff,</i> v. W. KENNETH PAXTON, in his official capacity as Attorney General of Texas, <i>Defendants.</i>	Civil Action No. 3:24-cv-00352
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**DEFENDANT W. KENNETH PAXTON’S RESPONSE
TO PLAINTIFF’S STATUS REPORT**

There is no live controversy. In fact, there *never* was. *See Google, Inc. v. Hood*, 822 F.3d 212, 224-25 (5th Cir. 2016) (holding that a pre-enforcement challenge to a state’s non-self-executing subpoena is not ripe for review).

Nonetheless, Las Americas asked the Court to intervene. But its complaint and request for emergency relief were based on multiple verifiably false statements. And it now relies on many of those same statements in its Status Report to argue the case is not moot. Pursuant to Rule 11(c), the Office of the Attorney General intends to file a motion regarding those statements on October 31, 2024.

Dated: October 22, 2024

Respectfully submitted,

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Attorney General of Texas

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/s/ Rob Farquharson
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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of October 2024, a copy of the foregoing document was filed using the Court's Electronic Case Filing System and served on all counsel of record that receive electronic notices of filing from that system by email.

/s/ Rob Farquharson

ROB FARQUHARSON

Assistant Attorney General